

Amended Complaint

①

Ajoola Ajayi #249055  
P.O Box 165300  
SLC, UT 84116

FILED IN UNITED STATES DISTRICT  
COURT, DISTRICT OF UTAH

JUL 26 2024

GARY P. SERDAR  
CLERK OF COURT  
DEPUTY CLERK

Amended Complaint BY \_\_\_\_\_

I am the Appellant  
In the United States District Court  
District of Utah  
351 S. west temple, Rm 1-100 Saltlake city,  
Utah. 84101

Ajoola Ajayi  
~~App~~ plaintiff

Vs

werden Bart mortensen,  
medical Dir Michelle Hofmann,  
Dir of prison Brian Redd,  
former werden FNU Powell  
Executive Dir Tracy S. Gruber,  
~~Nate~~ Deputy Dir Wate checketts,  
Deputy Dir David Litvack,  
Deputy Dir Nate winters.

Ammended Complaint  
to add additional defendants

2:24-CV-00366-DAK  
Case Number

Honorable Judge Dale A. Kimball  
Judge

I Ajoola Ajayi filing this Amended Complaint  
to 550 prisoner: Civil Rights violation complain; case number #  
2:24-CV-00366-DAK pursuant to Rule 15 of the federal  
Rules of Civil procedure

1. Plaintiff Ayoola Ajayi #24905 is a citizen of Utah, who presently reside in the state of Utah State Correctional Facility P.O Box 165300, SLC, UTAH 84116

Defendant Tracy S. Grubler, ~~is a citizen~~ Nate Checketts, David Litvack, Nate Wilters. Are all citizen of Utah and is employed at Utah State Correctional Facility for the Utah department of Corrections and is directly responsible for the wrongful actions alleged herein

## 2. Nature of Case / factual allegation

Defendants is responsible for medical going on at the prison which was catastrophically disaster when we came to new prison. Inmates not getting there medication; and are responsible for the procedure which makes it hard when we tried to refill medication. As a director they are directly responsible for the training the doctors has to go through including the nurse who seems not to have a clue what is going on or what to do but do everything to make the process of me getting my medication impossible but do nothing. Even makes me has to pay for co-pay from my surgery when they are the ones that cause the issues. So many complains but no actions to the extent that the state decided to take over the medical from the prison. Even still till today the prison think it's okay to take away my eye drops while on suicide watch until a doctor signed off on it which now led to me now legally blind. I am already deaf which makes life unbearable and hard to communicate

(3)

### Claim for Relief

Count 1: My Sixth amendment and interest to equal protection are denied

Count 2: My Eight amendment and liberty interest to be free from Cruelty and unusual punishment have been violated by defendants

### Prayer for Relief

- 1) Grant judgement against Tracy S. Gruber, Nate Chicketts, David Litvack, Nate Winters; in an amount of ~~\$2 million~~ \$2 million. Plus the 6 million requested from other 4 defendants to make \$8 millions
- 2.) Order and Injunction and changes to prison medical process
3. Award plaintiff Cost, Attorneys fees and Any other relief deemed just and proper by the court

Ayoola Ajayi  
~~AA~~ 7/19/24

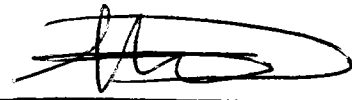
USCF

P.O box 165300

SLC, UT 84116

## Certificate of Service

I Ayoola Ajayi do hereby Certify that a true and correct copy of the foregoing documents was mailed to Attorney General Office at 160 E 300 S 6th floor, P.O box 140857, SLC, UT 84114-0857 on this day of 19<sup>th</sup> of July 2024



Signature

Ayoola Ajayi